

EXHIBIT G: Declaration of Dr. Germán A. Cadenas

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF
TEXAS VICTORIA DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants.

Case No. 6:23-cv-00007

**DECLARATION OF DR. GERMÁN A. CADENAS
(pursuant to 28 U.S.C. § 1746)**

I, Dr. Germán A. Cadenas, upon my personal knowledge, hereby declare as follows:

1. I am a United States citizen and was born in Mérida, Venezuela in 1987. In 2002, when I was 15, I moved to the United States with my family. I was undocumented from 2003-2011. I became a Lawful Permanent Resident after marrying my partner. I became a U.S. citizen in 2015.

2. I lived in Arizona for 14 years, where I completed high school, graduated college at Arizona State University, and to my knowledge, became the first undocumented person to be admitted to a Ph.D. program in the state. After earning my Ph.D. from Arizona State University, I moved from Arizona in 2016 to pursue a doctoral internship and postdoctoral fellowship at the University of California, Berkeley. In 2018, I accepted a position at Lehigh University as a

tenure-track professor in the Counseling Psychology program and moved to Philadelphia, Pennsylvania, where I currently live.

3. My academic work centers primarily on the psychology of immigration and focuses on the impact of immigration policy on the psychological wellbeing of undocumented youth. I also develop interventions to support undocumented youth in educational settings. I regularly provide trainings to educators and healthcare providers across the country on best practices for supporting undocumented youth on college campuses and in the community. My own experience struggling to navigate higher education while I was undocumented motivates and informs my work to eliminate barriers that prevent undocumented youth from accessing the resources they need to thrive.

4. I have also studied and published writing on declining conditions in Venezuela and their impact on the wellbeing of Venezuelans. For example, I am the author of *The Growing Venezuelan Diaspora in the United States*, published in 2018 in an academic compilation on Latinx Immigrants as part of the International and Cultural Psychology book series.

5. On October 26, 2022, I submitted to United States Citizenship and Immigration Services (“USCIS”) Form I-134, Declaration of Financial Support in support of my uncle. In January 2023, my application was approved and my uncle was authorized to travel to the United States and seek parole under the recently established parole process for Venezuelans. He was successfully paroled into the country in March 2023. As his supporter, I am providing, and will continue to provide, financial support to my uncle for the duration of his parole over the next two years.

6. My uncle is 63 years old. He is a Venezuelan citizen and was born in Mérida, Venezuela. He later moved to the state of Barinas, where he lived until arriving in the United States this

month. He is an agricultural engineer and worked for a variety of private companies, and briefly for a public agricultural institute, in Venezuela. Because of the difficult economic situation in Venezuela, he has struggled to find stable employment since 2007 and had trouble accessing basic necessities while also serving as the primary caregiver for my 91-year-old grandmother, a cancer survivor.

7. The challenges he faces are exacerbated by political repression in Venezuela. My uncle is opposed to the Hugo Chavez and Nicolás Maduro regimes, and he has lived in fear of speaking freely about his political beliefs. The government in Venezuela controls everything and makes life difficult for those who it views as opposition. My uncle was fired from a good job in 2007, after raising concerns of corruption within a public institute overseeing agricultural lending and development.

8. Life in Venezuela has become increasingly difficult for most of its residents. I see this both through my own academic scholarship as well as through the experiences of people like my uncle, an older adult who has been dedicated to caring for an elderly person for over 20 years. There is rampant economic instability, crime, corruption, and political tension in Venezuela, which makes daily functioning an ongoing challenge. Every day brings hassles, both new unexpected barriers and old worsening ones. For instance, the value of the currency has plummeted, making it nearly impossible to obtain necessities with the average wages and compensation. My uncle had to sell his vehicle because he could not afford its repairs, and to obtain gas to drive he would have to spend hours in line, sometimes all night.

9. The government in Venezuela controls access to most good jobs, which are not attainable despite someone's qualifications, unless the job candidate is an open supporter of the regime.

Most institutions have been eroded by the regime, including legal institutions and the rule of law. The courts make decisions based on bribes and corruption.

10. Access to quality healthcare and medications is limited unless one can pay for private healthcare, which has an exorbitant cost. This has been a tremendous challenge for my uncle given my grandmother's health problems. For example, my grandmother went blind in one eye after a doctor made errors during her cataract surgery. She was unable to pursue a personal injury case because of the corrupt legal system. Because of her past botched surgery, my grandmother is afraid of having another surgery, which she needs because she has cataracts in her other eye. My uncle feels distressed from witnessing the decay of the country and its impact on him and my grandmother.

11. I sponsored my uncle because I see it as my responsibility to return the care and support he has shown me throughout my life. My uncle has been an important figure in my life and I want him to be safe and reunited with our family. Growing up, he was like a second father to me. We spent many summers and Christmas holidays together. He provided major support to my parents in times of need, and he and my mom worked together to care for my grandmother during her cancer treatments. Thanks to him, I speak English: he enrolled me in English classes in Venezuela when I was a child and paid my tuition, though it was very expensive. My uncle has supported me my whole life and is a dear member of my family. It is a gift to now be in a position where I can support him.

12. Despite the distance, we have remained close over the last 20-plus years since I left Venezuela. We stayed in regular contact through text messages, phone calls, and occasional visits. Despite the significant cost, my uncle traveled from Venezuela to attend my college graduation, and later my marriage celebration, both times while on a tourist visa. Unfortunately,

as economic and social conditions worsened in Venezuela in recent years, such trips have become increasingly difficult to make. The electricity is also unstable where he lives, as is the case in many parts of the country, and he experiences several hours without electric power on a regular basis. This makes it difficult to communicate using technology.

13. Our family is very close-knit, and it's been hard for us to be here, knowing that there are extended family members like my uncle back in Venezuela who are really struggling. My family has been waiting a long time for a program like this, so when the parole program for Venezuelans opened in October, I applied as soon as possible to support my uncle.

14. It took me several days to gather the necessary documentation - such as bank statements and pay stubs - to complete the first part of the application process. My partner is also listed on the application as a supporter because we wanted to make it clear that we intend to support my uncle with our two incomes, if needed. I provided information about our bank accounts and our retirement accounts—all of our assets. The application was quite detailed and lengthy. I had to complete it with my uncle on the phone to make sure all the information was correct, and it took us several hours. The process is not very accessible for people with varying degrees of technology literacy. For example, I have loved ones with lower levels of English proficiency and technology literacy who also sponsored a family member. They were unable to complete the form on their own and required additional help.

15. After I completed the initial phase of the application process, I did not hear anything about the outcome for several months. Finally, in January 2023 I received notification that USCIS had approved my application. At that point, my uncle had to use the CBP One application to submit additional documents and information. That part of the process was difficult and stressful because CBP One requires an up-to-date smart phone, internet connection, and high

technology literacy. My uncle had an old smart phone and the CBP One application did not work on it: he could not download it on his phone. After a lot of back and forth, we were finally able to upload his documents, but it took almost one week of troubleshooting and seeking help from friends with more up-to-date phones in Venezuela that could run the application.

16. When my uncle first arrived in the United States, I met him at the airport and provided him housing at my home in Philadelphia. He had a comfortable room to stay in, as well as access to public transportation and my car as-needed. I showed him around our neighborhood and city and made sure he had everything he needed to be comfortable and begin to acclimate to life in the United States. He has since moved to live with another family member in Arizona, and he is welcome to return and live with me at any point in the future.

17. My uncle is an engineer with significant professional experience, but he is open to accepting any employment opportunities once he receives work authorization. While I am committed to supporting my uncle financially, he is also eager to contribute to the family as much as possible. He is committed to learn and integrate himself into his new community. We have already found options for English classes, and he is looking into additional educational opportunities. We are already concerned about what might happen if the program is blocked before he is granted his work permit, for which he applied within a week of arriving. We are trying to stay positive and thankful that he's here with us now.

18. It is a big relief to me, my parents, and the rest of my family that my uncle is here and safe. Sponsoring my uncle is a way for me not only to reciprocate the love and support he has shown me my entire life, but also to give back to my entire family. Having my uncle here relieves me and my family from some of the stress and worry about the daily hardships and lack of safety that he and other relatives have been living with in Venezuela for the past 20 years.

Even as we celebrate being together again, we also fear what would happen if he had to return to Venezuela. It would be a major relief to me and my family if he is able to remain in safety here. If there is a possibility to extend or renew his parole, I will apply for it and continue to support my uncle during any extended period of parole he is granted.

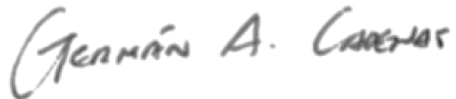
19. My family and I are thrilled that my uncle is here and safe. However, we remain concerned about the safety and wellbeing of other family members who remain in Venezuela. If the humanitarian parole program remains in place, I would like to explore the feasibility of sponsoring additional family members who are in vulnerable situations.

20. The humanitarian parole program for Venezuelans has been immensely beneficial for me and my family, and I know that it will continue to be helpful to us in the future if it is allowed to continue. The parole program for the nationals of other countries is a good and needed program that will allow for more families to be reunited, for loved ones to be together, and for people to seek temporary refuge from a difficult set of conditions that have negatively impacted millions of people. The positive impact that this program has had and will have on my family is immeasurable, and given the work I do, I feel confident in saying that this is also the case for countless other supporters and beneficiaries.

21. Knowing that the program is already in peril causes me a lot of strain and uncertainty. It is unimaginable to think of the distress, both physical and mental, that my uncle would experience if he had to return to Venezuela. Not having the parole program would also cause stress to my family as we would continue to worry about the safety and wellbeing of my uncle. We, Americans, should protect this program as it reflects the best of a humanitarian approach to immigration policy.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct.

Executed at Philadelphia, PA on March 27, 2023.

A handwritten signature in dark ink, reading "Germán A. Cadenas". The signature is written in a cursive style with a large initial 'G'.

Dr. Germán A. Cadenas